

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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DONALD M. LAINE,

Plaintiff,

SECRETARY OF DEPARTMENT OF HEALTH  
AND HUMAN SERVICES, UNITEDHEALTHCARE  
OF WISCONSIN, INC. and ERIE INSURANCE  
COMPANY,

Case No. 22-CV-00592

Involuntary Plaintiffs,

vs.

STATE FARM MUTUAL AUTOMOBILE INS. CO.  
and CONNIE SCHUELLER,

Defendants.

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**DEFENDANTS' ANSWER TO THE COUNTERCLAIM OF  
INVOLUNTARY PLAINTIFF, UNITEDHEALTHCARE OF WISCONSIN, INC.**

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NOW COME the above-named defendants, State Farm Mutual Automobile Insurance Company and Connie Schueller, by their attorneys, Alia, DuMez and McTernan, S.C., and as and for their answer to the Counterclaim of Involuntary Plaintiff, UnitedHealthcare of Wisconsin, Inc., admit, deny and allege as follows:

1. Answering Paragraph 1 of the Counterclaim, repeat, reallege and incorporate by reference as if fully set forth herein, their answer and affirmative defenses to the Complaint of the plaintiff.

2. Answering Paragraph 2 of the Counterclaim, allege a lack of knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, therefore deny same.

3. Answering Paragraph 3 of the Counterclaim, allege a lack of knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, therefore deny same.

4. Answering Paragraph 4 of the Counterclaim, allege a lack of knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, therefore deny same.

5. Answering Paragraph 5 of the Counterclaim, allege a lack of knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, therefore deny same.

6. Answering Paragraph 6 of the Counterclaim, allege a lack of knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, therefore deny same.

WHEREFORE, these answering defendants demand judgment as follows:

- A. Dismissal of the Counterclaim of Involuntary Plaintiff, UnitedHealthcare of Wisconsin, Inc., on the merits;
- B. The costs and disbursements incurred in defending this lawsuit; and
- C. Any other remedies the Court deems just and equitable.

Dated at Kenosha, Wisconsin this 20<sup>th</sup> day of October, 2022.

/s/ Matthew J. Richer

Matthew J. Richer

State Bar No. 1097557

Attorneys for Defendants

State Farm Mutual Automobile Insurance Company and

Connie Schueller

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